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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANA JEAN STEELE,

Defendant.

NOTICE OF INTENT TO RELY ON THE  
EXPERT TESTIMONY OF SPECIAL  
AGENT TYLER OLSON PURSUANT TO  
FED. R. CRIM. PRO. 16(a)(1)(G) AND  
FED. R. EVID. 702

Case No. 1:21-CR-73 RJS

Judge Robert J. Shelby

The United States of America (“United States”), by and through the undersigned Assistant United States Attorney, and pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure and Rule 702 of the Federal Rules of Evidence, hereby provides to defendant the following notice relating to expert testimony the United States may offer in the trial of this case.

The United States respectfully reserves the right to offer additional testimony by this expert, or other expert witness(es), and for the experts to amend or adjust their opinions and bases for those opinions due to information made known to the experts before or during trial.

**Rule 702 and Rule 16(a)(1)(G) Expert Notice**

Rule 702 of the Federal Rules of Evidence provides that “[a] witness who is qualified as an expert by knowledge, skill, experience, training, or education may testify in the form of an

opinion or otherwise if: (a) the expert’s scientific, technical, or other specialized knowledge will help the trier of fact to understand the evidence or to determine a fact in issue; (b) the testimony is based on sufficient facts or data; (c) the testimony is the product of reliable principles and methods; and (d) the expert has reliably applied the principles and methods to the facts of the case.” The Advisory Committee Note to the 2000 Amendments to the rule provides that “if the witness is relying solely or primarily on experience, then the witness must explain how that experience leads to the conclusion reached, why that experience is a sufficient basis for the opinion, and how that experience is reliably applied to the facts [of the case].” The United States provides the following proffer to fulfill the above requirements and the requirement of Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure and describes “the witnesses’ opinions, the bases and reasons for those opinions, and the witnesses’ qualifications.”<sup>1</sup>

### **Rule 16(a)(1)(G) Summary**

#### **Interstate Nexus**

The United States will offer expert testimony from ATF Tyler Olson. Agent Olson will testify regarding the origin of the following five firearms involved in this case (collectively, the “subject firearms”) as it relates to the interstate nexus element of 18 U.S.C. § 922(g)(1) (Felon in Possession of Firearms):

- Armscor, Model 200, .38 caliber revolver, S/N: AP210314,
- Romarm/Cugir, Model PSL, 7.62 caliber rifle, S/N: R-9749-09
- Romarm/Cugir, Model GP WASR 10-/63, 7.62 caliber rifle, S/N: 1975FV4994
- Molot, Model VEPR, 7.62 caliber rifle, S/N: 12VBK9030
- Taurus, Model PT111 G2, 9mm caliber pistol, S/N: TIX41754

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<sup>1</sup> See *United States v. Velarde*, 214 F.3d 1204 (10th Cir. 2000) (holding that a district court must make a reliability determination, but procedure for doing so within the discretion of the court).

Specifically, Agent Olson will testify that the subject firearms seized in this case on or about January 28, 2021, and that are alleged to have been possessed by defendant, were manufactured and/or traveled outside the state of Utah. By virtue of the subject firearms' presence in Utah, Agent Olson will opine that the firearms traveled in and thereby affected commerce. Agent Olson's opinion is based upon his examination of the relevant evidence and records pertaining to subject firearms and upon his training, experience, and research performed on these firearms.

Agent Olson's report, which he will rely upon for his testimony, is attached hereto as Exhibit 1. The United States anticipates Agent Olson will testify consistent with his report relating to the interstate commerce element under Count 1 of the Superseding Indictment for each of the subject firearms.

**Rule 16(a)(1)(G) Qualifications**

Agent Olson's qualifications and training are included in his CV, which is attached hereto as Exhibit 2. Agent Olson has extensive training and experience in, among other areas, firearms classification, identification, origin and design, as outlined in his CV. He has been with the Bureau of Alcohol, Tobacco, Firearms and Explosives since April 2008.

Agent Olson has received training relating to the identification of firearms and ammunition, including completing:

- ATF Industry Operations Investigator Basic Training, ATF National Academy in Glynco, Georgia (2004).
- Criminal Investigator Training Program, Federal Law Enforcement Training Center in Glynco, Georgia (2008).
- ATF Special Agent Basic Training, ATF National Academy in Glynco, Georgia (2008)
- ATF Firearms Interstate Nexus Training, ATF Firearms Technology Branch in Martinsburg, West Virginia (2012), which included specialized training on the definition of firearms, manufacturer and importer marking requirements, examining actual firearm markings, and reference material for researching firearms.

During the course of his duties, Agent Olson has had numerous contacts with Federal firearm importers, manufacturers, and dealers. Additionally, Agent Olson has examined thousands of firearms for the purpose of determining: (1) the manufacturer and/or importer, model, caliber/gauge, serial number, and place of manufacturer; (2) function and design; and (3) status as to the Gun Control Act and/or National Firearms Act. Agent Olson also has toured many firearm and manufacturing facilities as listed in his CV. Further, Agent Olson has access to, among other resources, multiple internal ATF databases and other proprietary information relating to firearm tracing, registration, licensing, inspections, firearm markings, variances, and technical reports relating to the identification and classification of firearms and/or ammunition. Agent Olson has been recognized as an expert witness in determining the interstate nexus of firearms and ammunition in the United States District Court for the District of Utah and the District of Nevada.

Pursuant to Rule 16(a)(1)(G)(iii), Agent Olson does not have any publications over the last ten years.

Pursuant to Rule 16(a)(1)(G)(iii), Agent Olson has testified as an expert at trial or deposition three times in the following cases:

- *United States v. Brandon Keith Thompson*, Case No. 2:21-cr-00316-DBB (District of Utah), date of testimony: 1/31/2023.
- *United States v. William Eblon Dean*, Case No. 2:18-cr-00128-CW (District of Utah), date of testimony: 12/12/2018.
- *United States v. Fernando Miguel Samora*, Case No. 2:17-cr-00637-JNP (District of Utah), date of testimony: 7/31/2018.

Pursuant to Rule 16(a)(1)(G)(v), Agent Olson has reviewed this summary and filing, and has approved this filing. Furthermore, she has allowed this filing to be electronically signed here:

/s/ Tyler K. Olson  
TYLER K. OLSON  
ATF Special Agent

DATED this 6<sup>th</sup> day of December, 2023.

TRINA A. HIGGINS  
United States Attorney

/s/ Nathan D. Lyon  
NATHAN D. LYON  
MARIA MOOERS-PUTZER  
Assistant United States Attorneys

# ATTACHMENT A

## U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

## Report of Investigation

Title of Investigation: Interstate Nexus Reports- Direct File Cases (FY 24)	Investigation Number: 788045-24-0002	Report Number: 16
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**SUMMARY OF EVENT:**

**INTERSTATE NEXUS DETERMINATION:** On December 5, 2023, Special Agent (S/A) Tyler Olson determined that firearms involved in this investigation traveled in interstate and/or foreign commerce.

**NARRATIVE:**

- ATF Special Agent (S/A) Tyler Olson attended the ATF Firearms Interstate Nexus Training Course in Martinsburg, West Virginia, which included training on the definition of firearms, manufacturer and importer marking requirements, examining actual firearm markings, and receiving reference material for researching firearms and ammunition. S/A Olson has previously been recognized as an expert in determining the interstate nexus of firearms and ammunition in the United States District Court for the District of Utah and District of Nevada.
- On December 5, 2023, S/A Olson determined that the following firearms were manufactured outside of the State of Utah, and therefore traveled in interstate and/or foreign commerce to arrive in the State of Utah:
  - Armcor, Model 200, .38 caliber revolver, serial number: AP210314, was manufactured by Armcor of the Philippines in the Philippines. The firearm was then imported into the United States by Armcor Precision Inc. dba Rock Island Armory in Pahrump, Nevada. The firearm was transferred to Williams Shooters Supply Inc. in Quincy, Illinois, and then Rods Armory Gallery in Boulder City, Nevada, where it was purchased by a Nevada resident. The firearm was recovered in Utah.
  - Romarm/Cugir, Model PSL, 7.62 caliber rifle, serial number: R-9749-09, was manufactured by Romarm/Cugir in Romania. The firearm was imported into the United States by Century Arms International in Georgia, Vermont. The firearm was then transferred to Centerfire Systems Inc. in Versailles, Kentucky, and then Kent Shooters Supply in Ogden, Utah, where it was purchased by an Oregon resident. The firearm was recovered in Utah.
  - Romarm/Cugir, Model GP WASR 10-/63, 7.62 caliber rifle, serial number: 1975FV4994, was manufactured by Romarm/Cugir in Romania. The firearm was imported into the United States by Century Arms International in Georgia, Vermont. The firearm was then transferred to Centerfire Systems Inc. in Versailles, Kentucky, and then Kent Shooters Supply in Ogden, Utah, where it was purchased by a Utah resident. The firearm was recovered in Utah.

Prepared by: Tyler K. Olson	Title: Special Agent, Salt Lake City III	Signature:	Date:
Authorized by: Randolph K. Owens Jr	Title: Resident Agent in Charge, Salt Lake City III	Signature:	Date:
Second level reviewer (optional): Christopher B. Beavers	Title: Special Agent in Charge, Denver Field Division	Signature:	Date:

- Molot, Model VEPR, 7.62 caliber rifle, serial number: 12VBK9030, was manufactured by Molot (Vyatskie Polyany Machine Building Plant) in Russia. The firearm was imported into the United States by Tennessee Gun in Knoxville, Tennessee. The firearm was transferred to Kent Shooters Supply in Ogden, Utah, where it was purchased by a Utah resident. The firearm was recovered in Utah.
  - Taurus, Model PT111 G2, 9mm caliber pistol, serial number: TIX41754, was manufactured by Taurus in Brazil. The firearm was imported into the United States by Taurus International in Miami, Florida. The firearm was transferred to Davidson's Inc. in Greensboro, North Carolina, and then Ace Firearms LLC in West Jordan, Utah, where it was purchased by a Utah resident. The firearm was recovered in Utah.
3. S/A Olson further determined that these items are firearms as defined by Title 18, United States Code, Chapter 44, Section 921(a)(3).
  4. This determination was made through knowledge, training, and experience, by referencing the Bureau of Alcohol, Tobacco, Firearms and Explosives list of firearm manufacturers, importers, and dealers, using proprietary ATF issued marking variances, ATF tracing information, and/or other industry related reference material.
  5. The above determination is based on the description of the firearms from the ATF trace reports, and not on an actual examination of the firearms.

**ATTACHMENT:**

- Statement of Qualifications





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## Firearm Trace Details

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### Trace Reference

Trace Number:	<b>T20210051068</b>	Request Date:	02/03/2021
Status:	Completed	eTrace User:	MKRUEG1
Completion Date:	03/03/2021		

### Summary of Results

THIS FIREARM WAS TRACED TO A PURCHASER. FOR ANY QUESTIONS, PLEASE CONTACT ATF NATIONAL TRACING CENTER, FIREARMS TRACING BRANCH AT 1-800-788-7133.

**The information in this report must be validated prior to use in any criminal proceedings.**

### Firearm Information

Manufacturer:	TAURUS	Type:	PISTOL
Caliber:	9		
Model:	PT111 G2		
Serial Number:	TIX41754	Country of Origin:	BRAZIL
Barrel:		Ballistics No.:	
Finish:			
Importer:	TAURUS INTERNATIONAL MANUFACTURING INC, MIAMI FL		
Obliterated?	No	Removal Code:	
Restored:		Drill Size:	
Identifying Marks:			
Images Attached:	0		

### Requestor Information

Law Enforcement Agency UT0290100 OGDEN CITY POLICE DEPARTMENT 2186 LINCOLN AVENUE OGDEN, UT 84401 UNITED STATES PHONE (801) 629-8221 Ext: FAX (801) 629-8086	Officer Last Name:	BURRELL
	Officer Suffix:	
	Officer First Name:	KASEY
	Officer Badge No.:	
Agency Case No.:	21N-94	

## Recovery Information

Firearm Recovered

Recovery Date:	01/28/2021	Time to Crime:	1895 days
Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Vehicle Year:	
		Vehicle Make:	
		Vehicle Model:	
		Vehicle Tag Number:	
Location Type:	RESIDENCE	Vehicle Tag State:	
		Vehicle Tag Country:	

## Dealer Information

### Dealer: 1

Business Name:	TAURUS	Out of Business
Licensee Name:	TAURUS INTERNATIONAL MANUFACTURING INC	
Address:	16175 NW 49TH AVE MIAMI, FL 33014	
FFL Number:	15923597	Last Inspection:
Contact Name:		Phone:
Invoice Number:		Transaction Date:

### Dealer: 2

Business Name:		
Licensee Name:	DAVIDSONS INC	
Address:	8320 TRIAD DR GREENSBORO, NC 27409	
FFL Number:	15610266	Last Inspection:
Contact Name:		Phone:
Invoice Number:		Transaction Date:

### Dealer: 3

Business Name:	ACE FIREARMS LLC	
Licensee Name:	ARMED CITIZENS EDUCATION LLC	
Address:	5569 W SNAPDRAGON COVE WEST JORDAN, UT 84081	
FFL Number:	98702015	Last Inspection:
Contact Name:		Phone:
Invoice Number:		Transaction Date:

## Purchaser Information

Name:	KENT BENSON CHUGG	Criminal History?	N/A
Last Known Address:	7519 KAY LN SOUTH WEBER, UT 84405	Race:	WHITE
		Sex:	M
Purchase Date:	11/21/2015	Height:	5 ft 10 in

DOB:	02/18/1955	Weight:	174 lbs
POB:	LOGAN, UT UNITED STATES		
ID 1:	UT DRIVER'S LICENSE	#:	002194601
Country 1:	UNITED STATES		
ID 2:	UT CONCEALED WEAPON PERMIT	#:	C120536
Country 2:	UNITED STATES		
Alias Name:		Alias DOB:	

### Possessor/Associate Information

#### Possessor

Name:	DANA JEAN STEELE	Criminal History?	N/A
Last Known Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Race:	WHITE
		Sex:	F
		Height:	5 ft 8 in
		Weight:	175 lbs
DOB:	10/18/1967		
POB:	UNITED STATES		
ID 1:	SOCIAL SECURITY	#:	***_**_6158
Country 1:	UNITED STATES		
ID 2:	FBI CRIMINAL ID	#:	407764EB1
Country 2:	UNITED STATES		
Alias Name:		Alias DOB:	

#### Associate

Name:	JUSTIN MICHAEL VANDERWOUDE	Criminal History?	N/A
Last Known Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Race:	WHITE
		Sex:	M
		Height:	5 ft 8 in
		Weight:	150 lbs
DOB:	10/21/1980		
POB:	UNITED STATES		
ID 1:	SOCIAL SECURITY	#:	***_**_9846
Country 1:	UNITED STATES		
ID 2:	FBI CRIMINAL ID	#:	190028TB7
Country 2:	UNITED STATES		
Alias Name:		Alias DOB:	

### Administrative Information

Priority:	ROUTINE	
NCIC Crime Code:	5212	POSSESSION OF WEAPON
Special Instructions:		
Gang Name:		

Trace Indicators: NAR - NARCOTICS RELATED

**This report does not constitute a fulfillment of the Interstate Nexus requirement in any Federal, State or Administrative legal process or litigation. That expert testimony or Interstate Nexus determination is made through trained experts who must be contacted at the local ATF Field Office or Field Division Directorate.**

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Back

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## Firearm Trace Details

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[Back](#)

### Trace Reference

Trace Number:	<b>T20210051092</b>	Request Date:	02/03/2021
Status:	Completed	eTrace User:	MKRUEG1
Completion Date:	03/18/2021		

### Summary of Results

THIS FIREARM WAS TRACED TO A PURCHASER. FOR ANY QUESTIONS, PLEASE CONTACT ATF NATIONAL TRACING CENTER, FIREARMS TRACING BRANCH AT 1-800-788-7133.

**The information in this report must be validated prior to use in any criminal proceedings.**

### Firearm Information

Manufacturer:	MOLOT (VYATSKIE POLYANY MACHINE BUILDING PLANT)	Type:	RIFLE
Caliber:	762		
Model:	VEPR		
Serial Number:	12VBK9030	Country of Origin:	RUSSIA
Barrel:		Ballistics No.:	
Finish:			
Importer:	TG KNOX TN - TENNESSEE GUN, KNOXVILLE, TN		
Obliterated?	No	Removal Code:	
Restored:		Drill Size:	
Identifying Marks:			
Images Attached:	0		

### Requestor Information

Law Enforcement Agency UT0290100 OGDEN CITY POLICE DEPARTMENT 2186 LINCOLN AVENUE OGDEN, UT 84401 UNITED STATES PHONE (801) 629-8221 Ext: FAX (801) 629-8086	Officer Last Name:	BURRELL
	Officer Suffix:	
	Officer First Name:	KASEY
	Officer Badge No.:	

Agency Case No.: 21N-94

## Recovery Information

Firearm Recovered

Recovery Date:	01/28/2021	Time to Crime:	2715 days
Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Vehicle Year:	
		Vehicle Make:	
		Vehicle Model:	
Location Type:	RESIDENCE	Vehicle Tag Number:	
		Vehicle Tag State:	
		Vehicle Tag Country:	

## Dealer Information

### Dealer: 1

Business Name:	TGI KNOX TN	Out of Business
Licensee Name:	TG INTERNATIONAL INC	
Address:	4662 SINGLETON STATION RD LOUISVILLE, TN 37777	
FFL Number:	16201596	Last Inspection: 07/31/2015
Contact Name:		Phone: (865) 977-9707
Invoice Number:		Transaction Date:

### Dealer: 2

Business Name:	KENT SHOOTERS SUPPLY	Out of Business
Licensee Name:	RJJ INC	
Address:	307 WASHINGTON BLVD OGDEN, UT 84404	
FFL Number:	98733042	Last Inspection: 09/06/2018
Contact Name:		Phone: (801) 394-8487
Invoice Number:		Transaction Date: 07/26/2013

## Purchaser Information

Name:	GABRIEL COLIN LEATHERBURY	Criminal History?	N/A
Last Known Address:	5152 S 100 E WASHINGTON TERRACE, UT 84405	Race:	WHITE
		Sex:	M
Purchase Date:	08/23/2013	Height:	5 ft 10 in
		Weight:	204 lbs
DOB:			
POB:			
ID 1:		#:	
Country 1:			
ID 2:	SOCIAL SECURITY	#:	7033
Country 2:	UNITED STATES		
Alias Name:		Alias DOB:	

## Possessor/Associate Information

### Possessor

Name:	DANA JEAN STEELE	Criminal History?	N/A
Last Known Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Race:	WHITE
		Sex:	F
		Height:	5 ft 8 in
		Weight:	175 lbs
DOB:	10/18/1967		
POB:	UNITED STATES		
ID 1:	SOCIAL SECURITY	#:	***_**_6158
Country 1:	UNITED STATES		
ID 2:	FBI CRIMINAL ID	#:	407764EB1
Country 2:	UNITED STATES		
Alias Name:		Alias DOB:	

### Associate

Name:	JUSTIN MICHAEL VANDERWOUDE	Criminal History?	N/A
Last Known Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Race:	WHITE
		Sex:	M
		Height:	5 ft 8 in
		Weight:	150 lbs
DOB:	10/21/1980		
POB:	UNITED STATES		
ID 1:	SOCIAL SECURITY	#:	***_**_9846
Country 1:	UNITED STATES		
ID 2:	FBI CRIMINAL ID	#:	190028TB7
Country 2:	UNITED STATES		
Alias Name:		Alias DOB:	

## Administrative Information

Priority:	ROUTINE	
NCIC Crime Code:	5212	POSSESSION OF WEAPON
Special Instructions:		
Gang Name:		
Trace Indicators:	NAR - NARCOTICS RELATED	

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[Back](#)

### Trace Reference

Trace Number:	<b>T20210049870</b>	Request Date:	02/02/2021
Status:	Completed	eTrace User:	MKRUEG1
Completion Date:	03/17/2021		

### Summary of Results

THIS FIREARM WAS TRACED TO A PURCHASER. FOR ANY QUESTIONS, PLEASE CONTACT ATF NATIONAL TRACING CENTER, FIREARMS TRACING BRANCH AT 1-800-788-7133.

Additional Remarks: PER SERIALIZATION, THE S/N IS MISSING DIGITS.

**The information in this report must be validated prior to use in any criminal proceedings.**

### Firearm Information

Manufacturer:	ROMARM/CUGIR	Type:	RIFLE
Caliber:	762		
Model:	GP WASR 10/63		
Serial Number:	1975FV4994	Country of Origin:	ROMANIA
Barrel:		Ballistics No.:	
Finish:			
Importer:	CAI GEORGIA VT - CENTURY INTL ARMS INC.		
Obliterated?	No	Removal Code:	
Restored:		Drill Size:	
Identifying Marks:			
Images Attached:	0		

### Requestor Information

Law Enforcement Agency UT0290100 OGDEN CITY POLICE DEPARTMENT 2186 LINCOLN AVENUE OGDEN, UT 84401 UNITED STATES PHONE (801) 629-8221 Ext: FAX (801) 629-8086	Officer Last Name:	BURRELL
	Officer Suffix:	
	Officer First Name:	KASEY
	Officer Badge No.:	

Agency Case No.: 21N-94

## Recovery Information

Firearm Recovered

Recovery Date:	01/28/2021	Time to Crime:	2640 days
Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Vehicle Year:	
		Vehicle Make:	
		Vehicle Model:	
		Vehicle Tag Number:	
Location Type:	RESIDENCE	Vehicle Tag State:	
		Vehicle Tag Country:	

## Dealer Information

### Dealer: 1

Business Name: C A I / CENTURY ARMS  
Licensee Name: CENTURY INTL ARMS INC  
Address: 236 BRYCE BLVD  
GEORGIA, VT 05454-5529

FFL Number:	60305541	Last Inspection:	02/12/2020
Contact Name:		Phone:	(802) 527-1258
Invoice Number:		Transaction Date:	

### Dealer: 2

Business Name: CENTERFIRE SYSTEMS INC Out of Business  
Licensee Name: UNITED ARMS CORPORATION  
Address: 102 FIELDVIEW DRIVE  
VERSAILLES, KY 40383

FFL Number:	46101473	Last Inspection:	05/24/2010
Contact Name:		Phone:	(859) 873-9544
Invoice Number:		Transaction Date:	06/28/2013

### Dealer: 3

Business Name: KENT SHOOTERS SUPPLY Out of Business  
Licensee Name: RJJ INC  
Address: 307 WASHINGTON BLVD  
OGDEN, UT 84404

FFL Number:	98733042	Last Inspection:	09/06/2018
Contact Name:		Phone:	(801) 394-8487
Invoice Number:		Transaction Date:	10/30/2013

## Purchaser Information

Name:	GABRIEL COLIN LEATHERBURY	Criminal History?	N/A
Last Known Address:	5152 S 100 E WASHINGTON TERRACE, UT 84405	Race:	WHITE
		Sex:	M

Purchase Date:	11/06/2013	Height:	5 ft 10 in
		Weight:	200 lbs
DOB:	10/31/1981		
POB:	CARROLLTON, KY UNITED STATES		
ID 1:	UT DRIVER'S LICENSE	#:	193079282
Country 1:	UNITED STATES		
ID 2:	SOCIAL SECURITY	#:	7033
Country 2:	UNITED STATES		
Alias Name:		Alias DOB:	

### Possessor/Associate Information

#### Possessor

Name:	DANA JEAN STEELE	Criminal History?	N/A
Last Known Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Race:	WHITE
		Sex:	F
		Height:	5 ft 8 in
		Weight:	175 lbs
DOB:	10/18/1967		
POB:	UNITED STATES		
ID 1:	SOCIAL SECURITY	#:	***_**_6158
Country 1:	UNITED STATES		
ID 2:	FBI CRIMINAL ID	#:	407764EB1
Country 2:	UNITED STATES		
Alias Name:		Alias DOB:	

#### Associate

Name:	JUSTIN MICHAEL VANDERWOUDE	Criminal History?	N/A
Last Known Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Race:	WHITE
		Sex:	M
		Height:	5 ft 8 in
		Weight:	150 lbs
DOB:	10/21/1980		
POB:	UNITED STATES		
ID 1:	SOCIAL SECURITY	#:	***_**_9846
Country 1:	UNITED STATES		
ID 2:	FBI CRIMINAL ID	#:	190028TB7
Country 2:	UNITED STATES		
Alias Name:		Alias DOB:	

### Administrative Information

Priority:	ROUTINE	
NCIC Crime Code:	5212	POSSESSION OF WEAPON
Special Instructions:		

Gang Name:	
Trace Indicators:	NAR - NARCOTICS RELATED

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## Firearm Trace Details

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[Back](#)

### Trace Reference

Trace Number:	<b>T20210051088</b>	Request Date:	02/03/2021
Status:	Completed	eTrace User:	MKRUEG1
Completion Date:	02/03/2021		

### Summary of Results

THIS FIREARM WAS TRACED TO A PURCHASER. FOR ANY QUESTIONS, PLEASE CONTACT ATF NATIONAL TRACING CENTER, FIREARMS TRACING BRANCH AT 1-800-788-7133.

Additional Remarks: THIS FIREARM WAS PREVIOUSLY TRACED FOR C FOLLUM WITH THE WEBER COUNTY SHERIFF'S OFFICE, TRACE NUMBER T20120122544, CASE NUMBER 12-12728, CONTACT NUMBER (801) 778-6602, TRACE COMPLETED ON 04/27/2012.

**The information in this report must be validated prior to use in any criminal proceedings.**

### Firearm Information

Manufacturer:	ARMSCOR OF THE PHILIPPINES (SQUIRES BINGHAM)	Type:	REVOLVER
Caliber:	38		
Model:	200		
Serial Number:	AP210314	Country of Origin:	PHILIPPINES
Barrel:		Ballistics No.:	
Finish:			
Importer:	API - ARMSCOR PRECISION INC. PAHRUMP, NV		
Obliterated?	No	Removal Code:	
Restored:		Drill Size:	
Identifying Marks:			
Images Attached:	0		

### Requestor Information

Law Enforcement Agency	Officer Last Name:	BURRELL
UT0290100	Officer Suffix:	
OGDEN CITY POLICE DEPARTMENT	Officer First Name:	KASEY
2186 LINCOLN AVENUE		
OGDEN, UT 84401		
UNITED STATES		
PHONE (801) 629-8221 Ext:		
FAX (801) 629-8086		

Officer Badge No.:

Agency Case No.: 21N-94

### Recovery Information

Firearm Recovered

Recovery Date:	01/28/2021	Time to Crime:	3315 days
Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Vehicle Year:	
		Vehicle Make:	
		Vehicle Model:	
		Vehicle Tag Number:	
Location Type:	RESIDENCE	Vehicle Tag State:	
		Vehicle Tag Country:	

### Dealer Information

#### Dealer: 1

Business Name:	ROCK ISLAND ARMORY/APINTL		
Licensee Name:	ARMSCOR PRECISION INTERNATIONAL		
Address:	150 N SMART WAY PAHRUMP, NV 89060		
FFL Number:	98800908	Last Inspection:	10/20/2016
Contact Name:		Phone:	(775) 537-1444
Invoice Number:		Transaction Date:	

#### Dealer: 2

Business Name:	WSS QUINCY IL	Out of Business
Licensee Name:	WILLIAMS SHOOTERS SUPPLY INC	
Address:	1813 QUINTRON WAY QUINCY, IL 62305	
FFL Number:	33713307	Last Inspection:
Contact Name:		Phone:
Invoice Number:		Transaction Date:

#### Dealer: 3

Business Name:	RODS ARMORY GALLERY	Out of Business
Licensee Name:	BEASLEY, RODNEY D	
Address:	1557 FOOTHILL DR #A102 BOULDER CITY, NV 89005	
FFL Number:	98801715	Last Inspection:
Contact Name:		Phone:
Invoice Number:	21046541	Transaction Date:

### Purchaser Information

Name:	RODNEY DALE BEASLEY	Criminal History?	N/A
Last Known Address:	832 BRAHMA LN HENDERSON, NV 89002	Race:	WHITE

Purchase Date:	01/01/2012	Sex:	M
DOB:	07/16/1951	Height:	
POB:	VA	Weight:	
	UNITED STATES		
ID 1:	SOCIAL SECURITY	#:	7977
Country 1:	UNITED STATES		
ID 2:		#:	
Country 2:			
Alias Name:		Alias DOB:	

### Possessor/Associate Information

#### Possessor

Name:	DANA JEAN STEELE	Criminal History?	N/A
Last Known Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Race:	WHITE
		Sex:	F
		Height:	5 ft 8 in
		Weight:	175 lbs
DOB:	10/18/1967		
POB:	UNITED STATES		
ID 1:	SOCIAL SECURITY	#:	***_**_6158
Country 1:	UNITED STATES		
ID 2:	FBI CRIMINAL ID	#:	407764EB1
Country 2:	UNITED STATES		
Alias Name:		Alias DOB:	

#### Associate

Name:	JUSTIN MICHAEL VANDERWOUDE	Criminal History?	N/A
Last Known Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Race:	WHITE
		Sex:	M
		Height:	5 ft 8 in
		Weight:	150 lbs
DOB:	10/21/1980		
POB:	UNITED STATES		
ID 1:	SOCIAL SECURITY	#:	***_**_9846
Country 1:	UNITED STATES		
ID 2:	FBI CRIMINAL ID	#:	190028TB7
Country 2:	UNITED STATES		
Alias Name:		Alias DOB:	

### Administrative Information

Priority:	ROUTINE
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NCIC Crime Code:	5212	POSSESSION OF WEAPON
Special Instructions:		
Gang Name:		
Trace Indicators:	NAR - NARCOTICS RELATED	

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## Firearm Trace Details

[View the Referral Lists associated with this trace](#)

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[Back](#)

### Trace Reference

Trace Number:	<b>T20210051110</b>	Request Date:	02/03/2021
Status:	Completed	eTrace User:	MKRUEG1
Completion Date:	03/28/2021		

### Summary of Results

THIS FIREARM WAS TRACED TO A PURCHASER. FOR ANY QUESTIONS, PLEASE CONTACT ATF NATIONAL TRACING CENTER, FIREARMS TRACING BRANCH AT 1-800-788-7133.

Additional Remarks: MODEL WAS RECORDED ON FORM 4473 AS PSL54.

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### Firearm Information

Manufacturer:	ROMARM/CUGIR	Type:	RIFLE
Caliber:	762		
Model:	PSL		
Serial Number:	R-9749-09	Country of Origin:	ROMANIA
Barrel:		Ballistics No.:	
Finish:			
Importer:	CAI GEORGIA VT - CENTURY INTL ARMS INC.		
Obliterated?	No	Removal Code:	
Restored:		Drill Size:	
Identifying Marks:			
Images Attached:	0		

### Requestor Information

Law Enforcement Agency UT0290100 OGDEN CITY POLICE DEPARTMENT 2186 LINCOLN AVENUE OGDEN, UT 84401 UNITED STATES PHONE (801) 629-8221 Ext: FAX (801) 629-8086	Officer Last Name:	BURRELL
	Officer Suffix:	
	Officer First Name:	KASEY
	Officer Badge No.:	

Agency Case No.: 21N-94

### Recovery Information

Firearm Recovered

Recovery Date:	01/28/2021	Time to Crime:	4039 days
Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Vehicle Year:	
		Vehicle Make:	
		Vehicle Model:	
		Vehicle Tag Number:	
Location Type:	RESIDENCE	Vehicle Tag State:	
		Vehicle Tag Country:	

### Dealer Information

#### Dealer: 1

Business Name: C A I / CENTURY ARMS  
 Licensee Name: CENTURY INTL ARMS INC  
 Address: 236 BRYCE BLVD  
 GEORGIA, VT 05454-5529

FFL Number:	60305541	Last Inspection:	02/12/2020
Contact Name:		Phone:	(802) 527-1258
Invoice Number:		Transaction Date:	

#### Dealer: 2

Business Name: CENTERFIRE SYSTEMS INC Out of Business  
 Licensee Name: UNITED ARMS CORPORATION  
 Address: 102 FIELDVIEW DRIVE  
 VERSAILLES, KY 40383

FFL Number:	46101473	Last Inspection:	05/24/2010
Contact Name:		Phone:	(859) 873-9544
Invoice Number:		Transaction Date:	12/15/2009

#### Dealer: 3

Business Name: KENT SHOOTERS SUPPLY Out of Business  
 Licensee Name: RJJ INC  
 Address: 307 WASHINGTON BLVD  
 OGDEN, UT 84404

FFL Number:	98733042	Last Inspection:	09/06/2018
Contact Name:		Phone:	(801) 394-8487
Invoice Number:		Transaction Date:	12/29/2009

### Purchaser Information

Name:	GABRIEL COLIN LEATHERBURY	Criminal History?	N/A
Last Known Address:	2335 N MARINE DR APT 10 PORTLAND, OR 97217	Race:	WHITE

Sex: M

Purchase Date:	01/07/2010	Height:	5 ft 10 in
		Weight:	220 lbs
DOB:	10/31/1981		
POB:	KY		
	UNITED STATES		
ID 1:	OR DRIVER'S LICENSE	#:	8548163
Country 1:	UNITED STATES		
ID 2:	SOCIAL SECURITY	#:	7033
Country 2:	UNITED STATES		
Alias Name:		Alias DOB:	
Notes:	PURCHASER BIRTH CITY RECORDED AS CARROLTON ON FORM 4473.		

### Possessor/Associate Information

#### Possessor

Name:	DANA JEAN STEELE	Criminal History?	N/A
Last Known Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Race:	WHITE
		Sex:	F
		Height:	5 ft 8 in
		Weight:	175 lbs
DOB:	10/18/1967		
POB:	UNITED STATES		
ID 1:	SOCIAL SECURITY	#:	***_**_6158
Country 1:	UNITED STATES		
ID 2:	FBI CRIMINAL ID	#:	407764EB1
Country 2:	UNITED STATES		
Alias Name:		Alias DOB:	

#### Associate

Name:	JUSTIN MICHAEL VANDERWOUDE	Criminal History?	N/A
Last Known Address:	1231 VALHALLA DR CLEARFIELD, UT 84015	Race:	WHITE
		Sex:	M
		Height:	5 ft 8 in
		Weight:	150 lbs
DOB:	10/21/1980		
POB:	UNITED STATES		
ID 1:	SOCIAL SECURITY	#:	***_**_9846
Country 1:	UNITED STATES		
ID 2:	FBI CRIMINAL ID	#:	190028TB7
Country 2:	UNITED STATES		
Alias Name:		Alias DOB:	

### Administrative Information

Priority:	ROUTINE
NCIC Crime Code:	5212 POSSESSION OF WEAPON

Special Instructions:  
 Gang Name:  
 Trace Indicators: NAR - NARCOTICS RELATED

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## ATTACHMENT B

### **QUALIFICATIONS STATEMENT**

Tyler K. Olson, Special Agent  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Denver Field Division  
Salt Lake City Field Office

I, Tyler K. Olson, hereby declare and state:

1. I am employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been so employed since April 2008. As a Special Agent with ATF, one of my responsibilities is conducting criminal investigations concerning violations of Federal firearm laws. I was previously employed as an ATF Industry Operations Investigator (IOI) starting in October of 2004. As an IOI, I was responsible for conducting firearm application and compliance inspections for Federal Firearm Licensees (FFLs).
2. I have a Bachelor of Science Degree in Business Administration/Marketing from Weber State University in Ogden, Utah, and a Master of Business Administration Degree from Westminster College in Salt Lake City, Utah. I am currently enrolled at Oklahoma State University working towards a Master of Forensic Science degree specializing in Arson and Explosive Investigation (21 of 32 hours completed).
3. I have received formal training in law enforcement as it pertains to the recognition and identification of firearms and ammunition. This training includes, but is not limited to the following:
  - ATF Industry Operations Investigator Basic Training, ATF National Academy, Glynco, Georgia (2004).
  - Criminal Investigator Training Program, Federal Law Enforcement Training Center, Glynco, Georgia (2008).
  - ATF Special Agent Basic Training, ATF National Academy, Glynco, Georgia (2008).
  - Firearms Interstate Nexus Training, ATF Firearms Technology Branch, Martinsburg, West Virginia (2012).
4. The ATF Firearms Interstate Nexus Training Course in Martinsburg, West Virginia, included specialized training on the definition of firearms, manufacturer and importer marking requirements, examining actual firearm markings, and reference material for researching firearms. I personally examined the ATF Firearms Technology Branch's Reference Collection, which included over 10,000 firearms (now over 14,000 firearms).
5. During the course of my duties, I have had numerous contacts with Federal firearm importers, manufacturers and/or dealers. I have examined thousands of firearms for the purpose of determining the manufacturer and/or importer, model, caliber/gauge,

serial number, place of manufacturer; function and design, and status as related to the Gun Control Act and/or National Firearms Act.

6. I have personally toured many firearm and ammunition manufacturing facilities including *Armstrong International*, *Arsenal*, *Wild West Guns*, *Jimenez Arms*, *Henderson Defense Industries*, *Rifle Dynamics*, *Long Mountain Outfitters*, *Silver State Armory*, *New Frontier Armory*, *Nevada Cartridge*, *Browning Arms*, *Kodiak Industries*, *Cobra Enterprises*, *North American Arms*, and *OSS Suppressors (Huxwrx)*. I have observed the steps, processes, and equipment used in the manufacturing of firearms and ammunition.
7. I have access to internal ATF databases and other proprietary information relating to firearm tracing, registration, licensing, inspections, firearm markings, variances, and technical reports relating to the identification and classification of firearms and/or ammunition. I regularly receive updated technical information from other ATF personnel involved in interstate nexus determinations.
8. I have accumulated a personal reference library of firearm and ammunition related publications such as *Gun Trader's Guide*, *Gun Digest*, *Flayderman's Guide to Antique American Firearms*, *Blue Book of Gun Values*, *Cartridges of the World*, and *Ammo Encyclopedia*. I maintain a reference library of historical firearm records and common proof marks utilized by numerous foreign countries. I subscribe to current firearm related magazines such as *Guns and Ammo*, in order to remain familiar with firearms and firearm trends. I have no previous publications.
9. I have acquired knowledge and experience as to the interstate nexus of firearms and ammunition, through my training, FFL inspections, criminal investigations, research, conferring with other experts, teaching, and certifications. I prepare reports and official correspondence relating to the identification, origin, and classification of firearms and ammunition under the provisions of the Federal firearm laws.
10. I have been recognized as an expert witness in determining the interstate nexus of firearms and ammunition in the United States District Court for the District of Utah and District of Nevada.

11. Previous Testimony:

Date of Testimony	Court	Case
1/31/2023	U.S. District Court, District of Utah	U.S. v. Brandon Thompson 2:21-CR-316
12/12/2018	U.S. District Court, District of Utah	U.S. v. Dean 2:18-CR-128
7/31/2018	U.S. District Court, District of Utah	U.S. v. Fernando Samora 2:17-CR-637

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Tyler K. Olson  
Special Agent